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Re: Comments on The Revised Draft of DOE's Solid Waste EIS

I'll start this by adding my voice to a threnody that's likely become all too

1 familiar by now: The comment period is too **short!** The original document was too long to be read and critiqued in the time allowed: this revised document is more than three times as long. Page #s have changed, new charts and figures have been added; yet there is even **less** time granted to critique the new document than what was already inadequate in the first case. One preliminary suggestion—that new text should be marked off

2 somehow—in a different font, in parentheses, something—so that new comments can focus on what hasn't already been covered.

That said, I'll make what comments I can on what I've been able to glean in the straitened time I've had. I'll start with a description of what I'll be able to comment on: from the beginning, I could see that there was no hope of getting through the whole document in time, so I decided to concentrate on the comment response volume, reasoning that by analyzing the comments, and the responses thereto, I might get an idea of what'd been changed, what hadn't, and what the points of contention were. I soon

gave up on reading the whole thing, however—it was more than a thousand pages, and some of it very small print, dense with meaty questions, and the comments and answers were not adjacent. So I tried a compromise—I would just focus on the Agency comments and responses, and my own. Still no go—there was just too much. With difficulty (there being no index at all in the comment volume), I managed to locate my own comments, and tried to trace from comment to response—but I didn't manage to finish. This is what I've got so far:

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To begin on a minor note, I would expect an agency that deals w/radionuclides to have a printer that can handle Greek letters. One of my suggestions was to add notations of the **type** of radiation each radionuclide produced—but the symbols α (alpha), β (beta) & γ (gamma) were replaced by dashes in the response volume—as if they were bad words (maybe they are ☺)!

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More generally, at least in my case, the comment #s and the response #s were badly matched, making it very difficult to say which response was to which comment—sometimes the comment # was as much as ten off from the response #.

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I read through all the specific responses to my comments (we'll deal with the generic responses under 'points of contention'). My comments were generally of four sorts: attempts to make the document more readable, pointing out that there wasn't half so much consensus on certain points as was implied, pointing out the extreme difficulty of getting hold of secondary sources, and pointing out what seems to me a **profound** lack of knowledge of the present state of, history of, and possible futures of, the Hanford site and its environs.

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Comments that were intended to improve readability (requests for more definitions, suggestions to make maps more useable, requesting improvements in cross-references & citations, etc), were generally brushed off—usually without response; sometimes rudely (and oddly—for example, in the case of figure 4.20 (now 4.25), I requested that the map and the legend be placed on opposite pages, for ease of reference, and not on the recto & verso of the same page. The commentor responded (brusquely) that the format had not changed, but it **has**—my suggestion was implemented. If the commentor didn't know what 'recto' and 'verso' meant, I was available to be asked—or I could (rightly) have been taken to task for using technical terms, since I'd been complaining of overuse of technical terms myself. ☺)

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Comments about bald statements of (quasi-) fact where there was really considerable disagreement were mostly responded to in general responses, since (unsurprisingly) I wasn't the only one to make those comments. Responses to these comments varied: some said that the new document contained more information on these subjects, including the uncertainties and assumptions involved. I'm going to have to take that on (dubious) faith, as I haven't had time to check. I'm hoping that terms like 'some' and 'many' and 'includes' have been replaced with **numbers**, and the uncertainties clearly marked—but I can't **say** whether it's so, because I couldn't check in the time allowed.

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Other comments which I voiced along with many others went essentially unanswered—a large # of my comments and questions were referred to page 3.289, which is a generic response saying, essentially: 'We read your comments, but we're not going to respond to them, or change anything'.

Concerning the difficulty in getting access to secondary sources, the response was simply not adequate. Saying that sources are available in your reading room in Richland is about as useful as saying they're in the sub-basement of the library at the University of Illinois—they're very nearly as inaccessible. In simple self-defense, I've been forced to

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develop a reference library at home, taking up precious shelf space that I'd rather be using for books that are interesting to read ☺. This isn't sufficient, however, as sources I don't have are constantly (and incompletely) cited, and even the ones I **have** are poorly indexed if they're indexed at all. Documents must be available in all repository libraries in the area, and at least one copy of each must be circulating.

The last category of comments concerned what seems to me inadequate documentation of, (and, more generally, knowledge of,) the history of, present state of, and potential futures of the Hanford site and its environs. These comments were most likely to be unanswered or answered with a generic non-answer. According to your

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reckoning, I made 553 (or 544—the numbering is not consistent) comments: by a quick back-of-the envelope reckoning I'd say between ⅓ and ½ of them went essentially unanswered . Of those that were answered, only a very few promised corrections and elaborations. Whether these corrections and elaborations really were implemented, I can't say—I hadn't time to check. Otherwise, the common response was formulaic, to

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wit: "This comment does not change the assessment documented in the HSW EIS". This is **not** an answer. How would **I** know whether the comment does (or should) change the assessment? No reasoning is given, just the bald statement. The questions I asked seem to me important, and cannot be dismissed as 'details'. Mies van Der Röhe used to say that 'God dwells in the details', to which Stephen Jay Gould would add 'so does the

13 devil'. My assessment was that information on the site and its neighborhood was insufficient to make long-term plans, and I stand by that assessment. Paleoclimatology,

14 for example, might not help predict future climactic changes, but it would provide data on

15 how sudden (and how radical) changes could be. Present population figures are no guarantor of future demographic patterns. Very few species spend their entire earthly

16 career 'endangered': therefore the fact that there are no (known) endangered species on the site is not to say there will never be, or that the witch's brew stored there won't

17 threaten now-common species. Long term plans can't be made about materials whose long-term survival is unknown (eg asphalt, or concrete). The information about the

18 effects of radionuclides on humans is spotty at best. At the **very** longest we've only been playing with such things for a little more than a hundred years, and large-scale exposures have been more recent and often poorly documented. Drawing conclusions concerning 'safe' exposure levels is premature at best.

I could go on for pages, but the main point is simple. Not enough is known, and it

19 may be that not enough will **ever** be known. Having meddled in such matters, we can't just walk away, worse luck. So we have to deal with the mess we've got—which means that we **must** make the most conservative assumptions possible—we must assume that whatever's in those burial grounds is dangerous until **proven** harmless—and we must set a very high standard of proof.

This is as far as I've been able to go in the time allotted. If the comment period is extended, I'll try to add more. I'll leave you with two cartoons (next page): one on the size of the comment response volume, and one a general comment on laboratory testing.